

House Joint Resolution Number PRISCILLA DICKMAN CLAIM # ~~H36~~

3/3/3010

This testimony is to ask this committee to reconsider the decision of the Claims Commissioner to dismiss

claim # , Priscilla Dickman v State of Connecticut. That claim was made by Ms. Dickman for the

wrongful prosecution of workers compensation fraud. Commissioner James Smith dismissed this claim based on

in error. The Commissioner dismissed the claim stating that the claim for wrongful prosecution for workers

compensation fraud was a claim pending in a CHRO action No. 09/028/ and a Civil Action 08- 588 (CJD).

Attached for your review is clear documentation that this claim has not been presented in any other court so that

the claim commissioner did indeed have jurisdiction to grant the Right to Sue the State in this instance.

The CHRO action No. clearly addresses an action filed against the Office of State Ethics

which has no relationship to the wrongful prosecution of workers compensation fraud. The Civil action

08-588(CJD) attached- is in regards to discriminatory actions taken by the employer University of Connecticut

Health Center and failure to accommodate. This civil action is not addressing the issue before the Claims

Commissioner for wrongful prosecution of workers compensation fraud.

By way of background Priscilla Dickman was employed by the UConn Health Center from 1978 thru

November 1, 2005. In 1979 she was injured and an workers compensation claim was accepted by the

employer. A 40% disability rating was granted by Independent Medical Examiners and by 2005

HJ-19

Att
John GEIDA

a state disability retirement was granted. In the summer of 2005 the employer ordered two independent

surveillances performed in an attempt to charge Ms. Dickman with workers compensation fraud. In June

2005 the employer ordered an Independent Medical Exam and paid \$8,000.00 to attempt to advance

workers compensation fraud. When all reports were completed and presented to New Britain Workers

Compensation Commissioner Ernie Walker it was evident to all including the employer that workers

compensation fraud had not been committed by Priscilla Dickman. Commissioner Walker in October 2006

(attached) held a Formal Hearing and the employer was represented by Assistant Attorney General

Sara Posner. A settlement was granted in favor of Ms. Dickman and the case was closed.

Shortly thereafter with no new information the employer frustrated that it did indeed have a liability to Ms.

Dickman as was ordered by the Workers Compensation Commissioner requested she be arrested

and charged with workers compensation fraud with manufactured evidence and innuendos.

In February 2008 Ms. Dickman and her representative were told that the employer had dropped the

charge of workers compensation fraud. She was then instructed to file with the Claims

Commissioner to sue the employer for the actions it took - wrongful prosecution for the charge of workers

compensation fraud. Ms. Dickman had been threatened with twenty years in prison if found guilty of this workers

compensation fraud. Her name was listed on websites in regard to this unfounded charge for more than

two years. The stress and emotional strain for a handicapped individual

such as Priscilla Dickman

to have worked in pain with her injury for more than twenty years and then be charged with

workers compensation fraud by her employer is a total injustice. For the reasons stated above and

with the review of the documents presented to this body the decision of the Claims Commissioner to dismiss

this claim based on nonjurisdiction must be reversed and Ms. Dickman should be granted the right to

sue by Commissioner James Smith since this action has NOT been brought forward in CHRO No.

nor in the Civil case no 08-588(CJD) pending in Hartford .

Thank you,

Priscilla Dickman

Oct 18 08 10:14P

PRISCILLA C. DICKMAN

2807425220

P. 1

Sixth District Office
233 Main Street, 1st Floor Suite
New Britain, Connecticut 06051

Tel: (860) 827-7180
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State of Connecticut

WORKERS' COMPENSATION
COMMISSION

October 17, 2006

Commissioners

John A. Mastropietro, Chairman
A. Thomas White, Jr.
James J. Metro
George Waldron
Donald H. Doyle, Jr.
Jesse M. Frankl
Amado J. Vargas
Stephen B. Delaney
Leonard S. Paoletta
Ralph B. Marcarelli
Ernie R. Walker
Howard H. Belkin
Charles F. Senich
Michelle D. Truglia
Nancy E. Salerno

~~Transmittal~~
FYI for file
as well - *[signature]*

RE: Priscilla Dickman vs. University of Connecticut Health Center

Dear Attorneys Krzys & Posner:

Enclosed please find a true copy of the Finding & Award dated October 17, 2006 in the
above captioned matter.

Very truly yours,

Ernie R. Walker

Ernie R. Walker T.C.
Commissioner - Sixth District

Encl.

cc: Ms. Priscilla Dickman
2534 Boston Turnpike
Coventry, CT 06238

University of Connecticut Health Center
P.O. Box 4035
Farmington, CT 06034

Ex 3
pg 9 2

<u>WITNESS</u>	<u>EXAMINATION</u>	<u>ATTORNEY</u>	<u>PAGE</u>
Priscilla Dickman	Direct	Krzym	4
	Cross	Posner	8
	Redirect	Krzym	13

EXHIBITS

Claimant's Ex. A - Packet of Medical Reports

Joint Ex. 1 - Copy of Business Cards

BY COM. WALKER: Parties are here pursuant to a formal hearing notice issued on August 10, 2006 in the matter of Priscilla Dickman versus University of Connecticut Health Center with a date of injury of 10/19/79. This hearing is scheduled to go forward on October 17, 2006. Today is October 17, 2006. Can the parties please state their names and their clients for the record.

BY ATTY. KRZYS: Robert J. Krzys for the claimant.

BY COM. WALKER: Thank you.

BY ATTY. POSNER: Sarah Posner from the Attorney General's Office representing the State of Connecticut.

BY COM. WALKER: Thank you. It is my understanding pursuant to the hearing notice that the issue before the undersigned is a claim for 31-308a benefits pursuant to the claimant's claim that she's entitled to a differential. It is my understanding that the respondents leave the claimant to her proof and I believe Attorney Krzys you wish to call your client to the stand, is that correct?

BY ATTY. KRZYS: That's correct your Honor. I would just point out that there are two understandings that the parties have reached with respect to the claim and any other issues that have been opened in the case, one is that there's an agreement that the respondent will pay to the claimant, if it's not already been done, the sum of \$1,200.00 for the purchase of an ergonomic chair and that future---

BY COM. WALKER: Hold on, why don't we go off the record for a second.

(Whereby a brief discussion was held off the record.)

BY COM. WALKER: Attorney Krzys why don't you call your first witness.

BY ATTY. KRZYS: I'm going to call the claimant, Priscilla Dickman.

BY COM. WALKER: Raise your right hand for me please. PRISCILLA DICKMAN, having been called as a witness and first having been duly sworn by Commissioner Ernie Walker, did testify as follows:

BY COM. WALKER: Please remain standing and speak up a little louder for me and state your name and your work address, your home address, I don't care which one.

BY THE WITNESS: Priscilla B. Dickman, 2534 Boston Turnpike, Coventry, Connecticut 06238.

BY COM. WALKER: Thank you very much you may be seated. For the record Tammy if there is a request for the transcript please strike any agreements because it is my understanding that this Commissioner has to decide all issues. Attorney Krzys.

DIRECT EXAMINATION BY ATTY. KRZYS:

Q Ms. Dickman were you an employee of the University of Connecticut?

A Yes.

Q And have you since retired from the University of Connecticut?

A Yes, November of 2005.

Q November 2005?

A Yes.

BY COM. WALKER: Do you know the day in November?

Q Do you recall you retired on the first day of the month when you retired from State service so would it be November 1, 2005?

A Yes.

BY COM. WALKER: Thank you.

Q And while you were employed did you have an injury that has become an accepted workers' compensation claim for the date of October 19, 1979?

A Yes.

Q And did you retire due to that injury on November 1, 2005?

A Yes.

Q What was your job at the time of your retirement with your employer?

A I was a senior microbiologist.

Q And briefly what does a senior microbiologist do?

A You analyze specimens that are brought into the hospital, out-patient, in-patient, you perform antibiotic testing, we do a variety of identifications for fungus, bacteria, viruses.

Q And what is your educational background?

A I had about four and a half years of college, I have two degrees a B.A. degree in Spanish and science and a B.S. degree in Spanish and I went on to one year of graduate school for microbiology.

Q And did you have any other training regarding microbiology or things of that nature?

A Just career training over the course of the years provided by the Health Center.

Q And how old are you?

A Fifty point five years.

Q Approximately how much were you making on an annual basis at the time that you retired on November 1, 2005?

BY COM. WALKER: I also take administrative notice of the specific VA's in the file for Attorney Krzys and Ms. Dickman which state a separate body part lumbosacral spine, both knees, both hands, both ankles, a 17.5% PPD of the lumbar spine paid, a 6.25% of the right hand, a 3.75% of the left hand, 5% of the left knee, 5% of the right knee, 1.25% of the left ankle, 1.25% of the right ankle, MMI reached 3/17/88 for a combined number of weeks of 143.95. Attorney Krzys as stated prior to the opening of the record it's your position that Ms. Dickman is a pre July 1993 date of injury and that she's entitled to indefinite 31-308a differential; is that not correct sir?

BY ATTY. KRZYS: That's correct Commissioner.

BY COM. WALKER: And you've also requested I take administrative notice of the attached restriction report by Dr. Mike Thebal(phonetic) dated 11/28/01 which is also attached to the VA showing the restrictions that you're relying upon in regards this exhibit, is that also correct?

BY ATTY. KRZYS: That is also correct Commissioner.

BY COM. WALKER: Administrative notice is taken of the same. Attorney Posner you clearly would have no objection taking administrative notice of the list of restrictions attached?

BY ATTY. POSNER: Absolutely not.

BY COM. WALKER: Thank you very much. Attorney Krzys.

BY ATTY. KRZYS: That completes the questioning I had for the claimant Commissioner.

BY COM. WALKER: Thank you. Attorney Posner.

BY ATTY. POSNER: Yes, thank you Commissioner.

CROSS EXAMINATION BY ATTY. POSNER:

Q Good morning Ms. Dickman how are you?

A Good.

Q Now the business cards that were marked joint exhibit 1 I'd just like to ask you a couple of things now and I do thank you for providing those to me. You gave those business cards to me I believe in April of this year when we met for a hearing, is that your recollection?

A Yes.

Q Now I'm interested in, Priscilla's Custom Jewelry now it's your testimony that you were not able to make a go of that is that how I understand it?

A I've not really owned a business what I did was create cards, hope that if someone needed something they would call me and get catalogs and all that's basically done through catalogs--- (not audible)

Q But you did have some sales am I right?

A Yes.

Q So there was a time when you were actively engaged in pursuing that as well as the other businesses that you talked about?

A Attempting to find something I could do.

Q Actually Priscilla's Custom Jewelry was not just beads and bobbles it was jewelry that incorporated such materials as diamonds and sapphires and garnets and precious metals in the designs am I right?

A That was my goal was to work at that level, yes, designed with those types of things that I was interested in gemstones and things.

Q And in fact some of the customers for your business actually were State employees, is that right?

A My supervisor was, I'd meet with her during break time or my lunch time.

Q Understood. With regard to the travel business, Global Travel International, again that was something that at one time you were actively pursuing, is that right?

A It actually is a membership, it's more of a membership and then if we book travel with them then you get a percent, 5% off an airline ticket of \$200.00, but I hoped that maybe I could go on and go to school and do more with it.

Q So then for example early in the year 2005 there was actually a business trip that you took to Nicaragua in pursuit of the travel business that would have been in January, for about 10 days in January?

A Actually no it was personal pleasure but what I did when I went to Nicaragua is I met a gentleman who was our guide and he started to tell me about the country and I was actually trying to help him get his license and actually gave him some money so he could get his license and try and market the country more.

Q So it was sort of a mixed business and pleasure trip when you went to Nicaragua?

A Yes.

Q Would it be accurate if you recall that was in January of 2005 for about 10 days?

A Yes, that was planned six months to a year in advance.

Q Ms. Dickman it's my understanding that you do not claim or consider yourself to be totally incapable of gainful employment, is that right?

A Yes.

Q So you do believe that you do have some ability to engage in gainful employment at this time?

A I believe so and I tried to work with the physicians on that I was just put on Tramadol 300 milligrams a day. Fibro is something very difficult, you can look and you could feel physically like you could do things but it's extremely fatiguing and painful. I think that they're doing a lot of research and I think there will be some (inaudible)

Q In fact your doctor, Dr. Tortland, has given you several notes that he agrees that there is some ability that you have to pursue some gainful employment?

A Yes.

BY ATTY. POSNER: Maybe we'll put those reports from Dr. Tortland into the record, I do have them in my file. I'm going to have to hunt for them so I'll make a note to do that at the end if there's no objection to that.

BY ATTY. KRZYS: No objection.

BY COM. WALKER: Do you have any objection to, once we're done with this witness, marking all Dr. Tortland's reports as respondent's exhibit 1?

BY ATTY. KRZYS: No, I have no objection I just want to either on redirect or now have the claimant just identify who she's treating with now, I know she's treating with Dr. Tortland I believe there's one other physician, I'd just like to get that into the record who she's treating with now.

BY ATTY. POSNER: Okay.

BY ATTY. POSNER:

Q According to my information the travel business was also at least a factor in several trips---would you like to take a break?

A I'm just going to stand.

Q Please let us know we can do that if you need to. There was a trip that you took to Chawney Ridge Top Summit, was that again part of the pursuit of your travel business?

A No, we've been going to Chawney since 1982, my family has a timeshare.

Q That would have been in June of 2005?

A We only go in September but that particular year I made a mistake and didn't put it in so we went in June.

Q At any rate according to your testimony now can you explain to me a little bit more about why one of these businesses isn't now part of your routine, what happened?

A Well neither of them are because, and I worked with Dr. Hannon(phonetic) the psychologist on that and there's no trying to get through with the pain it's difficult to schedule and do things when you don't feel well, you get up in the morning and you're in a lot of pain, you take medication, make sure you get coffee and about 10:00 I can feel like I want to do something so then if I look into things and start to do things I just haven't had a stretch of time. I think a lot of it has been very stressful, I don't think I've had a stretch of time that I can devote to do something like that. I think I probably will be able to but I don't think that's anything that's happened yet.

Q You mentioned your retirement and am I right that it was a non service related disability retirement that you were granted?

A It was granted non service but confusing in fact they said to me it's one of those convoluted files and they wrote that right on top of the file because it said because of fibromyalgia the back was included etc. and fibro was a compensable claim but they didn't have the documents on it right away at the time my paperwork was completed. Attorney Jim Quinn had them and it took three weeks to get them from him and then when I put them in nothing ever (inaudible) so it came out you're correct as non service related but included fibromyalgia and the back injury which was compensable.

BY ATTY. POSNER: Thank you. I will look through my file for Dr. Tortland's records and that's all I have after that.

BY COM. WALKER: For the record Attorney Posner and Attorney Krzys I've reviewed the specific VA and the general VA in the file and I will state for the record that I am in agreement

Attorney Krzys in that Ms. Dickman's date of injury 10/19/79 is a pre July 1993 claim and therefore I will entertain his request that I look beyond the "Frankl ruling" if I do find that she is eligible for post 31-308a benefits. Attorney Krzys any redirect?

BY ATTY. KRZYS: Just briefly, we mentioned and we're going to mark as respondent's exhibit 1 the reports of Dr. Tortland.

REDIRECT EXAMINATION BY ATTY. KRZYS:

Q I'd just like to ask the claimant who she's treating with currently and plans to treat with going forward from this day in addition to Dr. Tortland?

A Dr. Tortland in Avon and Dr. Jonathan Gibson of Hartford Hospital.

BY ATTY. KRZYS: Thank you and thank you Commissioner I have nothing further of the claimant.

BY COM. WALKER: Thank you. Attorney Posner?

BY ATTY. POSNER: I have nothing further, thank you.

BY COM. WALKER: Attorney Posner and Attorney Krzys what I will do is I will take the exhibits and review the latest documents and issue a decision as to the request of 31-308a and the request as to the ergonomic chair and I will get you all a decision out as soon as possible. Thank you both for your time. Again I will review the documents and issue a decision accordingly.

(Whereby the hearing was adjourned.)

CERTIFICATION

I, Tammy Carlson, Hearing Reporter for the State of Connecticut Workers' Compensation Commission do hereby certify that the foregoing transcript is a true and accurate transcription of the tape recording taken at the hearing of Priscilla Dickman versus University of Connecticut Health Center held on October 17, 2006 before Commissioner Ernie Walker.

Tammy Carlson
Tammy Carlson
Hearing Reporter

PRISCILLA DICKMAN
2534 Boston Turnpike
Coventry, CT 06238
CLAIMANT

: STATE OF CONNECTICUT

: WORKERS' COMPENSATION
: COMMISSION

VS.

UNIVERSITY OF CONNECTICUT
HEALTH CENTER
P.O. Box 4035
Farmington, CT 06034
EMPLOYER

: SIXTH DISTRICT

: FILE #601029001

GAB ROBINS NORTH AMERICA
800 Connecticut Blvd., 5th Floor
East Hartford, CT 06108
INSURER

: OCTOBER 17, 2006

APPEARANCES:

The claimant was represented by Atty. Robert Krzys, 557 Prospect Avenue,
Hartford, CT 06105-2922.

The State of Connecticut was represented by Atty. Sarah Posner c/o Office of the
Attorney General, P.O. Box 120, Hartford, CT 06141-0120.

FINDING & AWARD

Pursuant to statutory notice to all parties, a formal hearing was held before
the undersigned on October 17, 2006 and the record was closed.

**BASED ON THE EVIDENCE PRESENTED, THE FOLLOWING FACTS
ARE FOUND:**

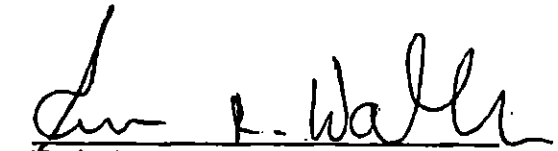
1. A contract of employment was in force between Priscilla Dickman,
hereinafter referred to as the claimant, and the State of
Connecticut/University of Connecticut Health Center hereinafter
referred to as the respondent-employer on October 19, 1979.
2. Both parties were subject to the provisions of the Compensation Act
and the respondent-employer had complied therewith by self-insuring
its compensation liability.

3. It is the claimant's contention that on or about October 19, 1979, she was involved in an accident in which she sustained injuries to her lower back; that she was disabled and continues to be disabled as a result of the aforesaid accident; that she required extensive medical attention and may require medical attention in the future; and that her condition is permanent in nature.
4. Alleging that said injuries arose out of and in the course of her employment, the claimant sought compensation for disability, past and future, both total and partial compensation for permanent injury and payment of all the reasonable medical, surgical, hospital and incidental bills incurred and to be incurred in connection with the treatment of her condition.
5. The respondent accepted the claim as compensable under the Connecticut Workers' Compensation Act. However, the respondent denies the extent of injury and disability as claimed by the claimant.
6. The undersigned has reviewed and evaluated all testimony presented, all respondent's full exhibits and joint exhibit 1 as a full exhibit.

**BASED ON THE EVIDENCE PRESENTED, I AM SATISFIED,
CONCLUDE AND FIND THAT:**

- A. The claimant shall receive payments pursuant to Connecticut General Statute Section 31-308a, in the amount of \$146.42 per week commencing November 1, 2005 and continuing for 376 weeks. This shall be the complete award to the claimant as to all claims for temporary and/or permanent total disability, temporary and/or permanent partial benefits, and benefits under 31-308a, based on the injuries alleged herein, physical or mental, known or unknown, past, present and future, and the indemnity portion of this claim, subject to the above payments, is hereby DISMISSED.
- B. Future medical claims as to the injury of October 19, 1979 shall remain open under the provisions of the Act.
- C. The respondent is to pay to the claimant the sum of \$1,200.00 for the purchase of an ergonomic chair.
- D. Payment of amounts due and commencement of bi-weekly payments will be deemed timely pursuant to Connecticut General Statute Section 31-303 if made within thirty (30) days from the date of this order.

WHEREFORE, IT IS ADJUDGED, DECREED AND ORDERED.

A handwritten signature in cursive script, appearing to read "Ernie R. Walker".

Ernie R. Walker
Commissioner - Sixth District

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FILED

2008 APR 18 P 12:29

Docket No.:

DISTRICT COURT
HARTFORD, CT.

PRISCILLA DICKMAN,
Plaintiff,

v.

308 CV 00588 CFD

JURY TRIAL DEMANDED

FELICIANO DIAS, KAREN DUFFY-
WALLACE, MARGERET SWETS,
IRENE KOWALSKI, GARY
LOOMIS, BRIAN EATON,
IRIS MAURIELLO, MARY
SANDERS, AND JESSICA VAN
ALSTYNE; and JOHN DOE, JANE
DOE, JAMES DOE, JUSTIN DOE, and
JENNY DOE, whose identities are
presently unknown to Complainant,
all in their individual capacities,

April 16, 2008

Defendants.

COMPLAINT

1. This is an action for injunctive relief and damages against the defendants in their individual capacities only to redress their civil rights deprivations committed by them against the Plaintiff because of her disability, union activity, whistleblower activities, worker's compensation claims and in retaliation for past complaints of discrimination, all in violation of 42 U.S.C. § 1983.

The Parties

2. The Plaintiff, PRISCILLA DICKMAN, is an individual residing in Coventry, Connecticut.

3. The Respondent, FELICIANO DIAS ("Dias"), is an individual employed with UCHC and the Complainant's former supervisor, and resides at 10 Ridgewood Road, Burlington, Connecticut 06013.

4. The Respondent, KAREN DUFFY-WALLACE ("Duffy-Wallace"), is a Labor Relations Attorney with UCHC and resides at 45 Boulder Road, Manchester, CT 06040.

5. The Respondent, MARGERET SWETS ("Swets"), is employed with UCHC in the Human Resources Department and resides at 40 Sylvan Avenue, Unionville, Connecticut 06085.

6. The Respondent, IRENE KOWALSKI ("Kowalski"), is an individual employed with UCHC as a Laboratory Manager, and resides at 164 Deer Run, Burlington, Connecticut 06013.

7. The Respondent, GARY LOOMIS ("Loomis"), is an individual employed with UCHC Security

8. The Respondent, BRIAN EATON ("Eaton"), is an individual employed with UCHC as a Benefits Officer, and resides at 39 Oakland Road, Southington, Connecticut 06489.

9. The Respondent, IRIS MAURIELLO ("Mauriello"), is an individual employed with UCHC as a Compliance/Ethics Director, and resides at 34-7 Georgetown Drive, Watertown, CT 06795.

10. The Respondent, MARY SANDERS ("Sanders"), is an individual employed with UCHC as a ~~Compliance/Ethics Director~~, and resides at 18 Timber Lane, Woodbridge, CT 06525.

11. The Respondent, JESSICA VAN ALSTYNE ("Alstyne"), is an individual employed with UCHC as Human Resources Officer, "

12. The Respondents, JOHN DOE, JANE DOE, JAMES DOE, JUSTIN DOE, and JENNY DOE, are individual employees of UCHC and the State who participated in the illegal

discriminatory actions described below, but whose identities and addresses are presently unknown to the Complainant.

The Facts

13. In or about February 1978, the Plaintiff was hired by UCHC as a Medical Technician II/Micro Biologist.

14. In or about 1979, the Plaintiff sustained a work-related lower back injury for which she was continuously discriminated against until her retirement in or about 2005.

15. At or about that time, the Plaintiff began union-related activities, for which she was also continuously discriminated against until 2005.

16. From 1990-98, the Plaintiff was chief steward of her union, and remained a union member from 1979-2005.

17. The Plaintiff was repeatedly subjected to unfair and discriminatory treatment as a result of her union-related activities.

18. Meanwhile, the Plaintiff's lower back injury worsened to such an extent as to partially incapacitate her.

19. The Plaintiff sought medical treatment, and, in 1982, received doctor's instructions to decrease her work week.

20. The reduced work week was to consist of three full days or five half-days of work.

21. UCHC stated that it could not make any accommodations for the Plaintiff, though she was eventually permitted to work five one-half days.

22. In 1982, the Plaintiff developed Fibromyalgia as a result of her lower-back injury, resulting in a 20% disability.

23. The Plaintiff reached a worker's compensation agreement with UCHC.

24. In or about 1983, the Plaintiff returned to full time employment because UCHC was unwilling to accommodate part-time work schedule and the Plaintiff did not want to give up her job.

25. As a result of the full-time schedule, the Plaintiff's condition worsened.

26. In or about 1988, the Plaintiff's disability was increased to 35%.

27. In or about 1988, the Plaintiff made a whistleblower claim.

28. In or about 1993, Diaz scheduled the Plaintiff to work in violation of her doctors' orders so as to exacerbate her injury.

29. Further, in an attempt to foreclose the Plaintiff's sizable Worker's Compensation claim, the Defendants attempted to eliminate the Plaintiff's employment.

30. In or about 2000, the Plaintiff's treating physicians, Drs. Ables and Dixon, limited the Plaintiff's workweek to four days.

31. In or about 2003, the Plaintiff was informed by management that she should begin looking for other employment because the Defendants were "coming after" her.

32. In or about November 2004, one of the Plaintiff's treating physicians, Dr. Tortland, ordered that the Plaintiff not be placed at the Plating Bench, which aggravated her injury, for more than eight (8) hours per week.

33. UCHC was also directed to make ergonomic accommodations for the Plaintiff.

34. Nevertheless, UCHC continued to move the Plaintiff from one location to another, without regard to the ergonomics of her position, and assign her to the Plating Bench in contravention of her doctor's orders.

35. Additionally, in or about November 2004, Diaz posted an employee schedule with the following note on it: "Priscilla needs to be moved as a result of what she says is poor

ergonomics.” He also stated to the Plaintiff, “Why don’t you retire?” You have been working 25 years

36. The above actions ultimately led to the Plaintiff’s CHRO Complaint in or about November 2004.

37. In or about January 2005, the Plaintiff fell down the stairs at work and sustained further injuries to her back. Nevertheless, she returned to work with ~~further restrictions~~.

38. In or about February 2005, Dr. Tortland asked the Plaintiff to fill in the top portion of a medical document (containing her medical information), which he then signed.

39. Later, the Defendants used the Plaintiff’s filling out the top portion of the document as a basis for instigating a criminal complaint.

40. Tortland directed that the Plaintiff be subjected to further limitations at work, including that she not be placed on the Plating Bench.

41. In or about April 2005, the Plaintiff was continuously assigned to the Plating Bench.

42. Eventually, the assignment on the plating bench led to the Plaintiff’s medical leave in which the Plaintiff’s disability mushroomed into depression.

43. On or about August 1, 2005, the Plaintiff commenced a ~~Worker’s Compensation~~ claim.

44. ~~Nine days later~~, on August 10, 2005, the Defendants commenced an investigation into the Plaintiff, including claims that she forged medical documents and committed insurance fraud.

45. These investigations culminated in ~~two~~ frivolous criminal complaints being brought against the Plaintiff.

46. The complaints ~~were~~ baseless, without merit, and spearheaded by the Defendants in retaliation for the Plaintiff’s union activities ~~and~~ work-related disability.

47. As recently as March 2007, the Defendants instigated an "ethics" complaint against the Plaintiff.

Cause of Action: Violation of 42 U.S.C. § 1983

48. The Plaintiff repeats and realleges the claims set forth in paragraphs 1-44.

49. The Plaintiff was deprived of rights secured by the Constitution or laws of the United States by the Defendants.

50. The alleged deprivation was committed under color of state law.

51. Wherefore, the Plaintiff demands judgment against the Defendants.

WHEREFORE, Plaintiff respectfully prays this Court:

- (a) To order an injunction against the defendants to stop and desist all harassment and unlawful actions against the Plaintiff;
- (b) To award her under 42 U.S.C. § 1983 all the pay and employment benefits she has lost as a result of the defendant's unlawful discrimination and retaliation against her;
- (c) To award her, under 42 U.S.C. § 1983, compensatory damages in the amount of \$3,000,000.00;
- (d) To award her, under 42 U.S.C. § 1983, punitive damages in the amount of \$10,000,000.00;
- (e) To award her under 42 U.S.C. § 1988 reasonable attorney's fees and costs of this action;
- (f) To award her such other and further relief as this Court deems just and proper.

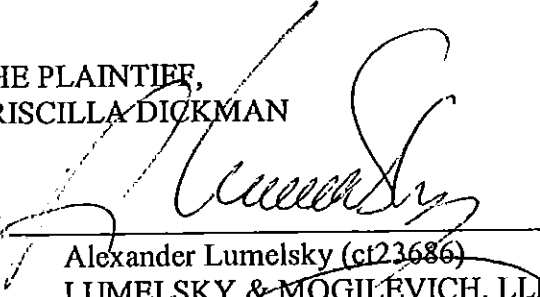
JURY DEMAND

Plaintiff hereby demands a trial by jury.

Respectfully submitted,

THE PLAINTIFF,
PRISCILLA DICKMAN

by



Alexander Lumelsky (cf23686)
LUMELSKY & MOGILEVICH, LLP
270 Farmington Avenue, Suite 365
Farmington, Connecticut 06032
(860) 677-8960
al@lumoglaw.com



CR07-069403

SUPERIOR COURT

STATE OF CONNECTICUT

JUDICIAL DISTRICT OF
HARTFORD AT G.A. 14

VS.

PRISCILLA C. DICKMAN

SEPTEMBER 23, 2008

AMENDED AND SUBSTITUTED

LONG FORM INFORMATION

FIRST COUNT

THE UNDERSIGNED ASSISTANT STATE'S ATTORNEY, MICHAEL J. SULLIVAN, FOR THE
STATE OF CONNECTICUT ACCUSES

PRISCILLA C. DICKMAN

OF

WORKERS' COMPENSATION FRAUDULENT CLAIM AND RECEIPT OF BENEFITS

AND CHARGES THAT AT OR NEAR THE TOWNS AND CITIES OF COVENTRY, FARMINGTON
AND OTHER TOWNS AND CITIES IN THE STATE OF CONNECTICUT ON DIVERSE DATES,
INCLUDING DATES BETWEEN FEBRUARY 1, 2005 AND MARCH 28, 2005 THE SAID PRISCILLA
C. DICKMAN, A STATE OF CONNECTICUT EMPLOYEE WORKING AT THE UNIVERSITY OF
CONNECTICUT HEALTH CENTER IN FARMINGTON, CONNECTICUT, DID IN REGARD TO HER
CLAIM AND RECEIPT OF WORKERS' COMPENSATION BENEFITS, INTENTIONALLY
MISREPRESENT MATERIAL FACTS AFFECTING HER CLAIM AND RECEIPT OF BENEFITS
INCLUDING BUT NOT LIMITED TO HER TRUE STATUS, ABILITY AND CAPACITY TO WORK, THE
CONDITIONS UNDER WHICH SHE COULD WORK, HER ATTENDANCE AT MEDICAL
APPOINTMENTS AND EXAMINATIONS AND HER CLAIMED INABILITY TO WORK. ALL IN
VIOLATION OF §31-290c(a)(1) OF THE CONNECTICUT GENERAL STATUTES.

SUBMITTED BY

BY THE STATE OF CONNECTICUT

BY:

Michael J. Sullivan

MICHAEL J. SULLIVAN

Sr. Assistant State's Attorney

Chief State's Attorney's Office

Workers' Compensation Fraud Control Bureau

CERTIFICATION

This is to certify that a true and accurate copy of the foregoing Long Form Information was hand delivered to Attorney Stephen H. Solomson on September 23, 2008

A handwritten signature in cursive script, reading "Michael J. Sullivan", is written over a horizontal line.

MICHAEL J. SULLIVAN
Commissioner of the Superior Court

**STATE OF CONNECTICUT
OFFICE OF THE CLAIMS COMMISSIONER**

CLAIM NUMBER: 21573

PRISCILLA DICKMAN

MARCH 27, 2009

MEMORANDUM OF DECISION: MOTION TO DISMISS

The claimant filed this action on July 28, 2008 and alleges that her former employer, the University of Connecticut Health Center, conducted an investigation that resulted in her arrest on March 29, 2007. The claimant alleges that the actions of the Health Center were motivated by a desire to retaliate against her for her Workers Compensation claim that she had successfully prosecuted. The claimant states that her arrest resulted from "false allegations" and that the charges were dropped on February 14, 2008. She seeks permission to sue the state.

Respondent filed a motion to dismiss dated February 5, 2009. Respondent asserts that the Claims Commissioner lacks subject matter jurisdiction as the claim alleges facts, which are similar, if not identical in many ways, to the facts alleged to support her complaint to the Commission on Human Rights and Opportunities (CHRO), Complaint No. 0910281¹ and Federal District Court lawsuit, Docket No. 3:08-cv-588 (CFD).²

The claimant filed an "Objection to Motion to Dismiss". Claimant argues that her claim before the Claims Commissioner alleges wrongful prosecution for Workers Compensation fraud and is different from the CHRO and Federal Court actions.³

¹ Priscilla Dickman vs. State of Connecticut, University of Connecticut Health Center, Office of State Ethics, Thomas Jones, Karen Duffy-Wallace, Felicia Dias, Irene Kowalski, John Doe, James Doe, Jane Doe and Joan Doe. Claimant alleges illegal discriminatory practice and continuance of harassment.

² Priscilla Dickman vs. Feliciano Dias, Karen Duffy-Wallace, Margaret Swets, Irene Kowalski, Gary Loomis, Brian Eaton, Joan Mazzone, Jessica Van Alstyne, Thomas Jones, Michael Morrissey, University of Connecticut Health Center, Office of State Ethics, Commission on Human Rights, State of Connecticut and John Doe, Jane Doe, James Doe, Justin Doe and Jenny Doe. In that action claimant alleges retaliation, harassment, discrimination, manufactured probable cause resulting in false arrest, selective and vexatious prosecution, malicious forethought, slander and defamation in violation of 42 U.S.C. 1983 and other statutory, regulatory and constitutional violations.

³ The claimant argues that she was not convicted. The judicial records verify that the claimant was originally arrested on four felony counts and was convicted on May 15, 2008 of one count of misdemeanor Forgery 3rd Degree

It is a well-settled principle that "the sovereign is immune from suit unless the state, by appropriate legislation, consents to be sued. State v. Chapman, 176 Conn. 362, 364 (1978); Baker v. Ives, 162 Conn. 295, 298 (1972); State v. Hartford, 50 Conn. 89, 90-91 (1882). Article Eleventh, Sec. 4 of the Connecticut Constitution provides that: "Claims against the state shall be resolved in such manner as may be provided by law." The legislation implementing this directive is set forth in Chapter 53 of the General Statutes. These provisions constitute a limited waiver of the sovereign immunity of the state. It is a well established principle that statutes in derogation of sovereign immunity should be strictly construed. DeFonce Construction Corporation v. State, 198 Conn. 520, 524 (1985); Berger, Lehman Associates, Inc. v. State, 178 Conn. 352, 355-56 (1979). Where there is any doubt about their meaning or intent they are given the effect which makes the least rather than the most change in sovereign immunity. White v. Burns, 213 Conn. 307, 312 (1990).

The Claims Commissioner has been placed in the position of "gatekeeper" to insure that waivers of sovereign immunity are consistent with the legislative scheme set forth in Chapter 53. While the exercise of discretion is authorized when deciding whether a claim is a "just claim", or whether a claimant should be granted permission to sue the state, that discretion is restricted when a claim is "excepted" from the Commissioner's jurisdiction. It would be unlawful for the Commissioner to ignore specific statutory limitations on his jurisdiction or to exercise discretion to expand it.

Subject matter jurisdiction involves the authority of the court (Commissioner) to adjudicate the type of controversy presented by the action before it. Lewis v. Gaming Policy Board, 224 Conn. 693, 698 (1993). Once the question of lack of subject matter jurisdiction of a court is raised, it must be disposed of no matter in what form it is presented . . . and the court must fully resolve it before proceeding further with the case. Golden Hill Paugussett Tribe of Indians v. Southbury, 231 Conn. 563, 570 (1995).

Chapter 53 of the General Statutes does not differentiate between "causes of action" or different theories of liability. A "claim" filed pursuant to Sec. 4-141 is defined as "a petition for the payment or refund of money by the state or for permission to sue the state". A "just claim" is defined as a claim which in equity and justice the state should pay provided the state has caused the damage or injury or has received a benefit. A claim accrues on the date that the damage or injury is sustained. Sec. 4-148(a). Sec. 4-147 sets forth the filing requirements for a notice of claim.

"Any person wishing to present a claim against the state shall file with the clerk of the Office of the Claims Commissioner a notice of claim, in duplicate, containing the following information: (1) The name and address of the claimant; the name and address of his principal, and claimant's representative capacity, if the claimant is acting in a representative capacity, and the name and address of his attorney, if the claimant is so represented; (2) *a concise statement of the basis of the claim, including the date, time, place and circumstances of the act or event complained of*; (3) a statement of the specific amount requested, and (4) a request for permission to sue the state, if such permission is sought." (emphasis added)

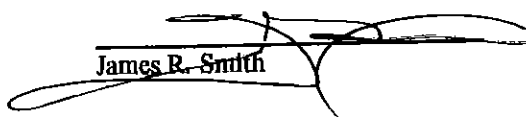
A claim is therefore concerned with an act or event causing damage or injury to a claimant. Claimant's factual or legal theories are only relevant to a request for permission to sue. To obtain permission to sue a claimant must first establish that the claim presents an issue of law or fact under which the state, were it a private person, could be liable. At that level of consideration a claimant's precise legal theory might be relevant, if the Claims Commissioner deems it "just and equitable" to grant permission to sue. However, the Commissioner must have jurisdiction before reaching those issues.

The limited jurisdiction of the Claims Commissioner excepts "claims upon which suit otherwise is authorized by law including suits to recover similar relief arising from the same set of facts" and claims for which an administrative hearing procedure otherwise is established by law. Connecticut General Statute §§ 4-142 (2)(3). If words of a statute are clear, the duty of a reviewing court is to apply the legislature's directive. "[T]he meaning of [a] statute must, in the first instance, be sought in the language in which the act is framed.... If the language of the statute is clear, it is assumed that the words themselves express the intent of the legislature.... Where [a] statute presents no ambiguity, we need look no further than the words themselves which we assume express the intention of the legislature." (citations omitted; internal quotation marks omitted) White v. Burns, supra, at 311.

The words of the legislature setting forth exceptions to the Claims Commissioner's jurisdiction are clear. If a claimant can pursue her "petition for payment" in a civil lawsuit, and that law suit arises from the same set of facts she relies on for her "claim", regardless of her various theories of liability, the Claims Commissioner lacks subject matter jurisdiction. A review of the CHRO complaint and the Federal Civil Rights action verify that the claimant alleges substantially the same conduct as a basis for those actions as she does here.

The Commissioner lacks jurisdiction. The claim is dismissed.

STATE OF CONNECTICUT
COMMISSIONER OF CLAIMS


James R. Smith

cc: Jane Emens, AAB

COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES

FORM 500(3)

RELEASE OF JURISDICTION

COMMISSION ON HUMAN RIGHTS AND
OPPORTUNITIES, ex rel.

Priscilla Dickman
Complainant

Date: April 14, 2009

vs.

State of Connecticut
Ethics Commission, Thomas Jones
Respondent

CCHRO CASE NO.: 0910281
EEOC CASE NO.: N/A

RELEASE OF JURISDICTION

Pursuant to Complainant's and/or Complainant's attorney(s) request dated **April 4, 2009**, the Commission on Human Rights and Opportunities hereby releases its jurisdiction over the above numbered and captioned complaint in accordance with Section 46a-101 of the Connecticut General Statutes. Also, in accordance with Section 46a-100, C.G.S. Complainant is hereby authorized to commence a civil action against the Respondent in the Superior Court for the judicial district in which the discriminatory practice is alleged to have occurred or in which the Respondent transacts business. If this action involves a state agency or official, it may be brought in the Superior Court for the Hartford-New Britain judicial district.

Please be advised that, pursuant to CONN. GEN. STAT. §46a-103, the Complainant or Complainant's attorney must serve on the Commission, at 21 Grand Street, Hartford, Connecticut 06106 at the same time all other parties are served, a copy of any civil action filed pursuant to this release. The Commission must be so served because it has a right to intervene in any action filed based on a release of jurisdiction.

In granting this release, the Commission expressly finds, in accordance with Sections 46a-100 and 46a-101(b) of the C.G.S., that all conditions precedent to the issuance of the release of jurisdiction have been complied with inasmuch as the complaint was filed in accordance with 46a-82 of the C.G.S and the complaint has been pending for a period of not less than 210 days, inasmuch as it was filed on **May 7, 2008** is still pending on **April 14, 2009**, a period in excess of two hundred and ten (210) days.

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Moreover, there is no reason to believe that the complaint will be resolved within a period of thirty (30) days from **April 20, 2009** the date the Commission received Complainant's request for the Release of Jurisdiction, nor is the complaint currently scheduled for public hearing. [see Section 46a-101(c) of the Connecticut General Statutes].

The complainant must bring an action in Superior Court within ninety (90) days of receipt of this release and within two (2) years of the date of filing the complaint with the Commission.

The Superior Court shall have such authority as is conferred upon it by Section 46a-104 of the C.G.S., and other laws of the State of Connecticut.

Concurrently, with the issuance of this Release of Jurisdiction, the Commission hereby administratively dismisses this complaint in accordance with Section 46a-101(d) of the Connecticut General Statutes. Furthermore, said dismissal is not subject to administrative judicial review.

Very truly yours,



Donald E. Newton
Chief of Field Operations

Dated and entered of record in the Commission's Administrative Office in Hartford, Connecticut on this 28th day of April, 2009.

cc: Complainant: Priscilla Dickman
Certified Mail Receipt 7008 1300 0001 8354 7397
Complainant's Attorney: N/A
Respondent(s): Carol Carson, Executive Director, State of Connecticut
Office of State Ethics
Respondent's Attorney: Attorney Donald R. Green, Assistant Attorney General
Office of the Attorney General, State of Connecticut
University of Connecticut Health Center
Regional Manager: Epifanio Carrasquillo, Regional Manager
Capitol Regional Office

Rev. 2/6/02

115 052

RESPONSE TO AFFIDAVIT OF ILLEGAL DISCRIMINATORY PRACTICE

Case Name: Priscilla Dickman v. Office of State Ethics

CHRO No. 0910280

1) My name is Priscilla Dickman and I reside at 2534 Boston Turnpike, Coventry, Connecticut 06238.

To the best of its knowledge and belief, Respondent admits the allegations contained in paragraph 1.

2) Respondent State of Connecticut is a State of the United States of America.

Admit.

3) Respondent University of Connecticut Health Center (hereinafter "UHC or Health Center" is a department or agency of the State of Connecticut with its principal place of operation at 263 Farmington Avenue, Farmington, Connecticut 06032 and Respondent State Office of Ethics is a department or agency of the State of Connecticut with its principal place of operation at 18-20 Trinity St., Hartford, Connecticut.

Admit. Except that the official name of the second Respondent is the Office of State Ethics.

4) The Respondents Feliciano Dias, Irene Kowalski, Karen Duffy Wallace, are individual employees of the Respondents UHC and the State of Connecticut who participated in the illegal discriminatory actions described below, but whose addresses are presently unknown to the defendant.

To the best of its knowledge and belief, Respondent admits that Feliciano Dias, Irene Kowalski, and Karen Duffy Wallace are, or were at one time, employed by UHC. With regard to the remaining allegations in paragraph 4, Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof.

5) The Respondent, Thomas Jones, Ethics enforcement Official is an individual who is employed by the Office of State Ethics, State of Connecticut who participated in the illegal discriminatory actions as described below and the continued harassment brought against me, but whose addresses are unknown.

Respondent Office of State Ethics admits that Thomas Jones is the Ethics Enforcement Officer for the State of Connecticut, and admit that he is employed by the Office of State Ethics, State of Connecticut. Deny as to his participation in any illegal discriminatory actions or harassment. Unable to determine if his address is unknown to Complainant.

6) The Respondent Jane Doe, Mary Doe, John Doe, and Jack Doe are individuals employed by the UCHC and Office of State Ethics who participated in the illegal discriminatory actions as described below and the continued harassment brought against me, but whose addresses and names are unknown at this time.

Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

7) The Complainant is also presently unaware of the exact number of individual employee Respondents responsible for the actions against her, and intends to include them all, even though she may not have named sufficient designations for them.

Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

8) From March 29, 2007 to the present, I was retaliated against for previously filing a discrimination complaint against the Respondent UCHC in the matter of Dickman VS. UCHC, CHRO 0610039.

To the extent that the allegations in this paragraph 8 relate to Respondent UCHC, Respondent Office of State Ethics has no knowledge or information upon which to form a belief and therefore leaves the Complainant to her proof. To the extent that the allegations in this paragraph 8 relate to Respondent Office of State Ethics, Respondent denies that it retaliated against Complainant.

9) I believe that my previous complaint of discrimination to the Commission was in whole or part a factor in the aforementioned acts and/or omissions committed by the Respondents.

To the extent that the allegations in this paragraph 9 relate to Respondent UCHC, Respondent Office of State Ethics has no knowledge or information upon which to form a belief and therefore leaves the Complainant to her proof. To the extent that the allegations in this paragraph 9 relate to Respondent Office of State Ethics, said allegations are denied.

10) I believe that the Respondent violated the following statutes and acts: C.G.S. 46a-58(a); C.G.S. 46a-60(a)(1); C.G.S. 46a-60(a)(4); Titles I and II of the Americans with Disabilities Act, Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2003 and the Civil Rights Act of 1991.

To the extent that the allegations in this paragraph 10 relate to Respondent UCHC, Respondent Office of State Ethics has no knowledge or information upon which to form a belief and therefore leaves the Complainant to her proof. To the extent that the allegations in this paragraph 10 relate to Respondent Office of State Ethics, said allegations are denied

11) The Respondent UCHC and the State of Connecticut employ more than 20 persons.

To the best of its knowledge and belief, Respondent admits the allegations contained in paragraph 11.

12) Complainant was employed by the UCHC from 1978-2005 and at all times was a member of the University Health Professionals Union Local 3837. A full enforce contract was negotiated between the UCHC and UHP Local 3837. Within that contract a negotiated process for disciplinary action existed for violation of workrules.

Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

13) At no time during the period Complainant was employed was a work rule or policy concerning use of State equipment or violation of a policy made known to the Complainant. At no time during the period in questions was there a universal policy in place which was made known to all employees to address the allegations made by the Respondents.

To the best of its knowledge and belief, Respondent Office of State Ethics denies the allegations in the first sentence of this paragraph 13. The allegations in the second sentence of paragraph 13 that state "[a]t no time during the period in questions was there a universal policy in place," are denied. As to the remaining allegations in paragraph 13, Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof.

14) Prior to her retirement in August 2005 the Complainant reviewed her official personnel file and paid for a copy of same. The file contained no mention of issues concerning violating State Ethics Policy, no mention of disciplinary action being taken in regards to violating State Ethics Policy, no mention of disciplinary action being taken in regards to violating State policy while employed. As a matter of record the file contained all evaluations thur her employment. All evaluations were satisfactory and commented on her work ethic and commitment to the University.

Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

14) Respondents UCHC, State Office of Ethics and the State of Connecticut, instituted a policy in May 2006 which in detail explained the State policy on use of State equipment to include, internet, emails, computer usage and the issues raised in the complaint against the Complainant. Employees were required to read and sign that they had been shown the policy and would adhere to it and fully understood it. Each individual was required to acknowledge receipt of the policy by June 2006 or thereabouts.

Respondent Office of State Ethics denies the portion of this paragraph 14 which states the Office of State Ethics "instituted a policy in May 2006 which in detail explained the State policy on use of State equipment to include, internet, emails, computer usage and the issues raised in the complaint against the Complainant." As to the remaining allegations in this paragraph 14, Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

15) On August 1, 2005, I filed a complaint of disability discrimination against UHC with the Commission.

Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

16) Thereafter, without any notification to me and without my knowledge, the Health Center and its employees, agents and agencies, as stated herein conducted a frivolous and malicious investigation intended purely for retaliatory purposes into my supposed use of State equipment for personal reasons while employed thru 2005.

To the extent that the allegations in this paragraph 16 relate to Respondent Office of State Ethics, said allegations are denied, except that Respondent Office of State Ethics admits that the Complainant used State equipment for personal reasons while employed thru 2005. As to the remaining allegations in paragraph 16, Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

17) This investigation apparently included the Respondents reviewing my emails and internet activity.

Respondent Office of State Ethics has knowledge that UHC conducted an investigation of Complainant. Respondent Office of State Ethics denies any participation in said investigation.

18) On June 2007 and again on March 18, 2008, the Health Center and its employees, agents and agencies, as stated served me with notice that I was under investigation for inappropriate use of State equipment while working and that as a retiree since 2005 this complaint if I was found to have violated the State Ethics policy could result in fines being levied against me. This has taken place without cause, basis or justification.

Respondent Office of State Ethics has knowledge that UHC conducted an investigation of Complainant. Respondent Office of State Ethics denies any participation in said investigation.

20) From June 7, 2007 to the present the Health Center, Office of State Ethics and its employees, agents and agencies, as stated above have conducted a harassing and vexacious pursuit of me into my retirement and refuse to withdraw their continue harassment and pursuit of me.

Respondent denies that it harassed or pursued Complainant vexaciously.

21) As a consequence, I have suffered extensive damages, including thousands of dollars in attorney's fees in the efforts to investigate the policies to defend myself against the allegations in the complaint.

Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.

22) I believe that I was singled out for the discrimination and retaliation due to my previous complaint to the Commission and the EEOC.

Respondent denies that it singled out Complainant, and denies that it discriminated or retaliated against Complainant.

23) I therefore charge the Respondent with retaliation and illegal discriminatory practices.

Respondent denies that it discriminated or retaliated against Complainant. With regard to what Complainant is charging, Respondent Office of State Ethics has insufficient knowledge or information upon which to form a belief and therefore leaves Complainant to her proof of the allegations thereon.